



March 1, 2012
Via ECFS Transmission

Marlene H. Dortch, Commission Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, D.C. 20554

RE: EB Docket No. 06-36
2012 CPNI Certification for WholeTel, Inc.

Dear Ms. Dortch:

In accordance with Federal Communications Commission's Enforcement Advisory No. 2012-01, DA 12-170, EB Docket No. 06-36, released February 16, 2012 and pursuant to 47 C.F.R. § 64.2009(e), WholeTel, Inc. hereby files its Certification of Customer Proprietary Network information (CPNI) and its supporting Statement for the year 2011. Please include this Certification in EB Docket No. 06-36.

Please contact me at 407-740-3006 or croesel@tminc.com if you have any questions about this filing.

Sincerely,

Carey Roesel
Consultant to WholeTel, Inc.

CR/gs
Enclosure

cc: Kamran Bashir – WholeTel
file: WholeTel – FCC CPNI
tms: FCCx1201

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2012:	Covering calendar year 2011
Date filed	March 1, 2012
Name of company(s) covered by this certification:	WholeTel, Inc.
Form 499 Filer ID:	828247
Name of signatory:	Mohammed Markatia
Title of signatory:	CEO

1. I, Mohammed Markatia, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. §64.2001 *et seq.*
2. Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in §64.2001 *et seq.* of the Commission's rules.
3. The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.
4. The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.
5. The company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Mohammed Markatia, CEO

Date _____

Attachments: Accompanying Statement explaining CPNI procedures

Attachment A
Statement of CPNI Procedures and Compliance

Statement of CPNI Procedures and Compliance

Use of CPNI

WholeTel does not use or permit access to CPNI to market any telecommunications or non-telecommunications services. WholeTel has trained its personnel not to use CPNI for marketing purposes. Should WholeTel elect to use CPNI in future marketing efforts, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

PROTECTION OF CPNI

WholeTel has put into place processes to safeguard its customers' CPNI from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to customer CPNI.

DISCLOSURE OF CALL DETAIL OVER PHONE

WholeTel does not provide access to CPNI over the phone.

DISCLOSURE OF CPNI ONLINE

WholeTel has instituted authentication procedures to safeguard the disclosure of CPNI on-line. WholeTel's authentication procedures do not require the use of readily available biographical information or account information as defined by the FCC. Customers wishing to have online access to billing information are required to establish a password and security question, without the use of readily available biographical information or account information, at the time of account set up. Unless the appropriate password is provided, WholeTel does not allow on-line access to CPNI.

WholeTel has established back-up authentication procedures for lost or stolen passwords that do not prompt the customer for readily available biographical information or account information. WholeTel's back-up authentication procedure operates as follows: The customer must provide a correct answer to the security question when prompted and only then will WholeTel send a new, temporary password to the email address associated with the account.

WholeTel has put into place procedures to notify customers whenever a password, customer response to a back-up means of authentication for lost or forgotten passwords, online account, or address of record is created or changed without revealing the changed information or sending the notification to the new account information.

NOTIFICATION TO LAW ENFORCEMENT

Company has in place procedures to notify law enforcement in the event of a breach of customers' CPNI and to ensure that customers are not notified of the breach before the time period set forth in the FCC's rules, or, if applicable, when so authorized by law enforcement. WholeTel will provide electronic notification of breach of CPNI within seven business days to the United States Secret Service and the Federal Bureau of Investigation. WholeTel will wait another full seven business days before notifying the affected customers of the breach unless otherwise directed by the relevant investigating agency.

WholeTel maintains electronic records of all breaches discovered and notifications made to the USSS and the FBI, and to customers. Records of discovered breaches will be maintained for at least two years.

WholeTel takes every reasonable precaution to protect the confidentiality of proprietary or personal customer information including secure storage of data, CPNI policy training for all employees with access to data, and strict adherence to the method and authorization required for release of CPNI.

ACTIONS AGAINST DATA BROKERS

Company has not taken any actions against data brokers in the last year.

CUSTOMER COMPLAINTS ABOUT CPNI BREACHES

Company did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2011.

INFORMATION ABOUT PRETEXTERS

Company has not developed any information with respect to the processes pretexters are using to attempt to access CPNI but does take steps to diligently protect CPNI.